

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re Bayou Hedge Fund Litigation

06 MDL 1755 (CM) (MDF)

This Document Relates To:

**BROAD-BUSSEL FAMILY LIMITED
PARTNERSHIP, et al.**

06 Civ. 3026 (CM) (MDF)

VS.

BAYOU GROUP LLC, et al.

MAY 9, 2007

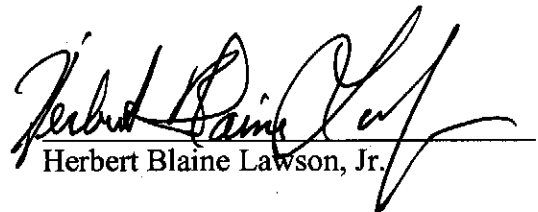
DECLARATION OF HERBERT BLAINE LAWSON, JR.

I, Herbert Blaine Lawson, Jr., declare under penalty of perjury under the laws of the United States of America as follows:

1. I am one of the named representative class action plaintiffs in the above litigation, No. 06 Civ. 3026 (CM).
2. I have read the Notice to All Parties and Counsel ("Notice") and the Response to April 19, 2007 Letter ("Response") filed in these proceedings by the Honorable Colleen McMahon on April 17 and April 20, 2007, respectively. I have also communicated with plaintiffs' counsel regarding the same. I am submitting this Declaration in light of the request in the Response for a further formal written statement by plaintiffs.
3. I (a) understand that I have an absolute right to seek *vacatur* of the September 7, 2006 decision issued by Judge McMahon which dismissed Citibank, N.A. as a defendant in this

litigation; (b) understand that any such application to seek *vacatur* would be heard by a judge other than Judge McMahon, and that Judge McMahon would have no input in that other judge's decision; (c) appreciate that I must either seek *vacatur* on the grounds of Judge McMahon's indirect beneficial holding of the common stock of Citigroup, Inc., the corporate parent of defendant Citibank, N.A., now, or be barred forever from challenging Judge McMahon's September 7, 2006 decision on the basis of this indirect beneficial holding of the common stock of Citigroup, Inc. in the future; and (d) voluntarily and freely waive my right to seek *vacatur* of Judge McMahon's September 7, 2006 decision. I add, however, that the foregoing waiver is limited solely to the conflict of interest described in the Notice and Response and is without prejudice to my right to challenge the September 7, 2006 decision on any and all other grounds, including the merits, on appeal from a judgment of the Court otherwise.

Dated: May 9, 2007



Herbert Blaine Lawson, Jr.